

## **REMARKS**

### **Status of Application**

Claims 12-20 are pending in this application. By this Amendment, claim 12 has been amended and claims 1-11 have been canceled without prejudice or disclaimer. The Amendment to claim 12 finds its basis in the current specification and drawings and has been made to expedite the prosecution.

### **Rejection under 35 U.S.C. §102**

Claims 1- 20 stand rejected under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,734,909 to Bennett. Claims 1-11 have been canceled rendering the rejection moot with respect to these claims. This rejection is respectfully traversed as it has been applied to claims 12-20.

Bennett discloses a method for controlling locking and unlocking of shared resources. A server 106 handles requests from first client 102 and second client 104. A resource lock manager 105 in the server 106 resolves contention between multiple clients. In order to avoid tying up server resources, the server process 105 queues client requests by writing a data structure containing the request information to a control block. When the server 106 receives a request from a client 102 or 104 to release or unlock a resource, a server process, which may or may not be the same process that queued the client request, unlocks the resource. When a resource becomes available, the server 106 releases the resource and gives it to the waiting client. This is accomplished by recoding in the control block a data structure indicating which client now holds the resource. See Column 7, lines 4-33. Additionally, the server process sends a response to the waiting client to indicate awarding of the resource and a message to the previous client indicating a lock release. See Column 7, lines 34-41 of Bennett.

Bennett fails to disclose several features of currently pending independent claims 12 and 16. With regard to claim 12, Bennett fails to disclose a client object having a lock granted method. The Office Action references Column 8, lines 1-20 of Bennett to

illustrate a client object having a lock granted method and refers to a “protocol using locks to allow common access”. See page 6, lines 4 and 5 of the Office Action. In Bennett, all of the objects and protocols handling access are described in relation to the server and not to the client. Although Bennett discloses the client requesting access, Bennett fails to disclose a client object having a lock granted method as required by claim 12.

Additionally, Bennett fails to disclose an object queue having a proxy lock granted method and a proxy lock request method that manage access to the data governed by the server object as defined in claim 12. Claim 12 requires that a client object requests access to data by calling the proxy lock method of the object queue.

The Office Action states on page 7, third full paragraph, that the “Client 104” of Bennett requests access to the data by calling the “Lock wait object 109”. On the contrary, as provided in Column 8, lines 29-35 of Bennett, the server process 121 handles all of the client requests for access to data. Step 406 of Bennett reveals that the server process 121 accesses the lock wait object 109 after receiving a client request for data. The client does not access a queue in the system of Bennett. In Bennett, the server process 121 operates between the clients 102, 104 and the server process 121.

Claim 12 clearly sets forth a system in which the object queue operates between a server object and a client object. In contrast, the system of Bennett illustrates a server process acting between a client object and a queue. In contrast to the claimed system, all of FIGs. 4A-4C of Bennett show a server process (either 121 or 122) acting between the client and the lock wait object 109. Bennett does not disclose a queue that communicates both with a server object and a client object as claimed.

Claim 12 further requires that the object queue call the server request lock method of the server object and that the server object then call the proxy lock granted method of the object queue. Bennett fails to show these features. The claimed structure would be inoperable in the system of Bennett due to the opposite locations of the server and the lock wait object of Bennett in relation to the client. As claimed, the object queue is

functionally positioned between the server object and the client object. Bennett fails to show this feature and the functional relationship that arises from this feature.

Claim 12 further requires that the object queue call the client lock granted method of the client object. As set forth above, Bennett fails to disclose any type of communication between an object queue and a client. Furthermore, Bennett fails to disclose a client object having a lock granted method.

As described in Bennett, the Lock Repository 108 includes data and objects but does not include processes. Thus, the lock repository of Bennett does not include any methods for managing data. In Bennett, the server processes control distribution of data. Thus, the lock repository of Bennett is passive and does not include the claimed processes for managing data. Accordingly, because Bennett fails to show at least the features discussed above, Bennett fails to anticipate claim 12.

With regard to independent claim 16, as discussed above in reference to claim 12, Bennett fails to disclose a computer-implemented method involving communication between a client and an object queue. Bennett further fails to disclose an object queue that calls any methods or that includes any methods. As set forth above with respect to claim 12, the object queue of Bennett is passive and does not interact with the client.

Nowhere does Bennett teach or suggest “calling by a client object of a proxy request lock method of an object queue” or “calling by the object queue of a server request lock method of the server object requesting the proxy access.” Furthermore, Bennett fails to disclose “calling by the server object of a proxy lock granted method of the object queue.” or “calling by the object queue of a client lock granted method of the client object.” Accordingly, the features of claim 16 are not taught by Bennett, and claim 16 is patentable over Bennett.

Claims 13-15 depend on claim 12, and claims 17-20 depend on claim 16. These claims define further features of the invention. With regard to claim 13, the Examiner has referenced “Jeffords” instead of Bennett. However, it does not appear that a §103 rejection was intended. Rather it appears that inclusion of the “Jeffords” patent was an

inadvertent oversight, since the section referenced appears more pertinent to Bennett. Clarification is respectfully requested.


The additional claims 14, 15, and 17-20 provide further distinctive features of the invention and define over the art of record for at least the reasons set forth above with respect to the independent base claims. Accordingly, since Bennett fails to disclose each and every feature of the claims set forth above, Bennett fails to anticipate the claims. Therefore, withdrawal of the rejection under 35 U.S.C. §102 is respectfully requested.

### **CONCLUSION**

Claims 12-20 are pending in this application. In view of the amendments and remarks, applicant respectfully requests that this application be allowed and passed to issue. Should any issues remain prior to issuance of this application, the Examiner is urged to contact the undersigned prior to resolve the same. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112 referencing Attorney Docket No. MFCP.87511.

Respectfully submitted,

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